

Baker & Hostetler LLP

45 Rockefeller Plaza
New York, NY 10111
Telephone: (212) 589-4200
Facsimile: (212) 589-4201
David J. Sheehan
Mark A. Kornfeld
Elizabeth A. Scully
Thomas L. Long

*Attorneys for Irving H. Picard, Trustee for the
Substantively Consolidated SIPA Liquidation of
Bernard L. Madoff Investment Securities LLC and the Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION CORPORATION, Plaintiff-Applicant, v. BERNARD L. MADOFF INVESTMENT SECURITIES LLC, Defendant.	Adv. Pro. No. 08-01789 (SMB) SIPA LIQUIDATION (Substantively Consolidated)
In re: BERNARD L. MADOFF, Debtor.	
IRVING H. PICARD, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC, Plaintiff, v. PLAZA INVESTMENTS INTERNATIONAL LIMITED, and NOTZ, STUCKI MANAGEMENT (BERMUDA) LIMITED Defendants.	Adv. Pro. No. 10-04284 (SMB)

**STIPULATION AND ORDER FOR VOLUNTARY DISMISSAL
OF ADVERSARY PROCEEDING WITH PREJUDICE**

WHEREAS:

A. On June 19, 2015, Irving H. Picard (the “Trustee”), as trustee for the liquidation of Bernard L. Madoff Investment Securities LLC (“BLMIS”) under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa-III, and the substantively consolidated estate of Bernard L. Madoff (“Madoff”) and Defendants Plaza Investments International Limited (“Plaza”), and Notz, Stucki Management (Bermuda) Limited (“NSMB”), reached a settlement agreement (the “Agreement”) resolving the claims at issue in the above-captioned adversary proceeding. On that same day the Trustee filed with this Court a Motion seeking entry of an order, pursuant to section 105(a) of the United States Bankruptcy Code and Rules 2002 and 9019 of the Federal Rules of Bankruptcy Procedure, approving the Agreement (the “9019 Motion”). The 9019 Motion was set to be heard on July 29, 2015.

B. On July 28, 2015 this Court entered an Order granting the 9019 Motion and approving the Agreement. (ECF No. 82).

NOW, THEREFORE, it is hereby STIPULATED AND AGREED that:

In accordance with Federal Rule of Bankruptcy Procedure 7041(a)(1)(ii), and Federal Rule of Civil Procedure 41(a)(1)(A)(ii), the Trustee and Defendants Plaza and NSMB hereby stipulate to a dismissal of the above-captioned adversary proceeding with prejudice, with each party bearing its own costs, attorneys’ fees, and expenses.

Dated: August 13, 2015

BAKER & HOSTETLER LLP

DEBEVOISE & PLIMPTON LLP

By: /s/ Elizabeth A. Scully
45 Rockefeller Plaza

By: /s/ Joseph P. Moodhe
919 Third Avenue

New York, New York 10111
Telephone: (212) 589-4200
Facsimile: (212) 589-4201
David J. Sheehan
Email: dsheehan@bakerlaw.com
Mark A. Kornfeld
E-mail: mkornfeld@bakerlaw.com
Thomas L. Long
E-mail: tlong@bakerlaw.com

--and--

Elizabeth A. Scully (*pro hac*)
E-mail: escully@bakerlaw.com
1050 Connecticut Ave., N.W., 1100
Washington, D.C. 20036
Telephone: (202) 861-1500
Facsimile: (202) 861-1783

*Attorneys for Irving H. Picard,
Trustee for the Substantively Consolidated
SIPA Liquidation of the estate of Bernard L.
Madoff Investment Securities LLC and the
estate of Bernard L. Madoff*

Dated: New York, New York
August 13th, 2015

SO ORDERED.

/s/ STUART M. BERNSTEIN
HONORABLE STUART M. BERNSTEIN
UNITED STATES BANKRUPTCY JUDGE

New York, New York 10022
Telephone: (212) 909-6000
Facsimile: (212) 909-6836
Joseph P. Moodhe
Email: jpmoodhe@debevoise.com
J. Robert Abraham
Email: jrabraham@debevoise.com
Shannon Rose Selden
Email: srselden@debevoise.com

*Attorneys for Defendants Plaza Investments
International Limited, and Notz, Stucki
Management (Bermuda) Limited*